

A-0007-000, '97

**U S. Department of Energy
Rocky Flats Field Office Response**

Attachment #1

**Response to Federal Energy Regulatory Commission (FERC) Inspection Comments
July, 1993**

- 1 Section A.1.b Dam A-3 Comment** "Two large areas of slumping on the upstream face, noted during the last year's inspection, had been repaired."

Response: These two areas have not yet been repaired. The repairs have been funded for FY95 and are scheduled to be completed by August 7, 1995.

- 2. Section B.4 Reservoir Comment.** "Under normal conditions, the outlet works of Dam C-2 is operated approximately once a month or as needed to keep the reservoir volume well below 10 percent capacity."

Response: Although this is the preferred mode of operation, due to operational constraints imposed by the Colorado Department of Health and Environment the outlet works of Dam C-2 have not been operated since 1989. Water is discharged from Pond C-2 by pump to a transfer line that connects to the Broomfield Diversion Ditch. An operations plan is currently being prepared to test operate the outlet controls on Dams A-4, B-5, and C-2, with work to be completed this fiscal year.

The reservoir volume in C-2 is maintained at approximately the 30 % capacity level.

- 3 Section B.6. Emergency Action Plan Comment:** "The DOE document, "Emergency Response Plan for Water Retention Pond Dam Failure for Rocky Flats Plant" (latest revision received by fax on August 6, 1992)(ERP), was reviewed and found deficient." .. "One significant deficiency in the ERP, in its present form, is the lack of a dam break analysis for Dam C-2 ""

Response. The Emergency Response Plan has undergone extensive revision and is now titled "Emergency Response Plan for Failure of Dams, 1-A25-5500-06 08. This ERP is undergoing final revisions and will be submitted for final editing by December 1994.

DOE is currently not preparing a dam break analysis for Dam C-2. According to the FERC guidelines, the need for a dam break analysis would not be required if Dam C-2 was downgraded from a Class 2 to a Class 3 dam. The Stanley Lake Reservoir is currently under construction and will serve as a containment structure between C-2 and Stanley Lake. Upon completion of the reservoir, the State Engineer will review the classification of C-2 and may downgrade the dam to a Class 3. This review is expected to occur in FY-95. If reclassification does not occur, a dam break analysis will then be prepared.

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Attachment #2

Rocky Flats Environmental Technology Site (RFETS) Actions Proposed in Response to Federal Energy Regulatory Commission (FERC) Inspection Findings July, 1993

FERC Findings

DAM A-2

(i) Bare spots on the dam upstream face need additional riprap, (ii) roadway crossing the spillway area needs regrading, (iii) excessive vegetative growth around outlets

DAM A-3

(i) Excessive vegetative growth on upstream face, the spillway channel and the outlet works

Sanitary Landfill DAM

(i) Excessive vegetation growth on both the upstream and downstream faces of the dam, (ii) a large eroded area above the upstream south wing wall of the spillway culvert to be repaired

DAM C-2

(i) Excessive vegetation growth on the upstream face and crest, (ii) high grass growth on the downstream face needs mowing, (iii) water treatment plant located in the spillway channel to be removed

RFETS ACTION PLAN

- 1 Funding has been obligated for repairing the bare spots on Dam A-2, and additional riprap will be placed on the upstream face of the dam. This work is scheduled for completion by August 7, 1995
- 2 Regrading of the roadway on Dam A-2 is scheduled for completion by May 26, 1995
- 3 RFETS has a Weed Control Program under the Watershed Management Plan that will be utilized to address the excessive vegetation on the upstream dam slopes. Herbicide application and selective burning are the two methods that have been chosen to control this vegetation. During 1994 analytical methods were developed to analyze for the presence of trace amounts of herbicides in water. This was necessary to satisfy the water quality standards imposed by the State of Colorado. Application of herbicides will be performed on a controlled basis beginning in 1995. In addition, application will be made for a "Burn Permit" from the State of Colorado to conduct selective open burning
- 4 To control excess vegetation and high grass growth on the dam crests, dam spillways, and downstream dam faces an Integrated Work Control Plan has been implemented. During the spring and summer months mowing will be performed to control both the height and growth of vegetation in those areas

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RFETS ACTION PLAN (Continued)

- 5 Control of excessive vegetation around the dam outlet works requires preparation of an Environmental Assessment (EA) since this work impacts Wetlands. The EA is currently being prepared and approval is expected by March 1995. The expected outcome is that routine maintenance will be allowed to continue.
6. The eroded area on the Sanitary Landfill dam spillway will not be repaired. The dam is scheduled to be drained in 1995 as part of the Operable Unit 7 remediation plan. The landfill pond will be filled in and capped as part of the remediation solution. Low pond levels are currently being maintained and it will not pose significant risk in the short term.
7. A plan is currently being prepared to move the water treatment plant that is located in the spillway of Dam C-2. While the present location of the treatment system represents less than 10% obstruction to the spillway, there does exist the potential for damage to the equipment in the event of a 100 year flood. A decision will be made in 1995 on the removal.